

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA**

IN RE: AQUEOUS FILM-FORMING FOAMS  
PRODUCTS LIABILITY LITIGATION

) Master Docket No.:  
) 2:18-mn-2873-RMG

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CITY OF CAMDEN, et al.,

*Plaintiffs,*

-vs-

3M COMPANY,

*Defendant.*

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) Civil Action No.:  
) 2:23-cv-03147-RMG  
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**CONSENT MOTION TO AMEND EXHIBITS TO  
MOTION FOR PRELIMINARY APPROVAL**

Plaintiffs, City of Camden, City of Brockton, City of Sioux Falls, California Water Service Company, City of Del Ray Beach, Coraopolis Water & Sewer Authority, Township of Verona, Dutchess County Water & Wastewater Authority and Dalton Farms Water System, City of South Shore, City of Freeport, Martinsburg Municipal Authority, Seaman Cottages, Village of Bridgeport, City of Benwood, Niagara County, City of Pineville, and City of Iuka (collectively, “Plaintiffs”), by and through Proposed Class Counsel, and with the consent of Defendant 3M Company (“3M”) and the State and other sovereign signatories below (the “Sovereigns”),<sup>1</sup> move

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<sup>1</sup> The Sovereigns are Arizona, California, Colorado, Connecticut, Hawaii, Maine, Maryland, Massachusetts, Minnesota, New Hampshire, New Jersey, New Mexico, New York, Ohio, Pennsylvania, Rhode Island, Tennessee, Texas, Vermont, and Wisconsin, as well as the District of Columbia, and the Commonwealth of the Northern Mariana Islands. At the time of this filing, the Commonwealth of Puerto Rico had not officially signed on to this consent motion, but did notify the parties that given the changes set forth herein, Puerto Rico did not intend to file an objection to the Motion for Preliminary Approval.

to amend certain of the exhibits to Plaintiffs’ Motion for Preliminary Approval of Class Settlement, for Certification of Settlement Class and for Permission to Disseminate Class Notice (the “Preliminary Approval Motion”) (2:23-cv-03147 ECF No. 10; 2:18-mn-2873 ECF No. 3370). The grounds for this motion are as follows:

1. Plaintiffs filed the Preliminary Approval Motion on July 3, 2023. The Preliminary Approval Motion attached as exhibits, among other things, a proposed Order granting preliminary approval of Plaintiffs’ and 3M’s Settlement and other relief (the “Proposed Preliminary Approval Order”) (Ex. 1 to the Preliminary Approval Motion, ECF No. 10-2; ECF No. 3370-2) and a Settlement Agreement Between Public Water Systems and 3M Company (the “3M Settlement Agreement”) (Ex. 2 to same, ECF No. 10-3; ECF No. 3370-3).

2. After the filing of the Preliminary Approval Motion, the Sovereigns filed a motion to intervene in this case (ECF No. 35; ECF No. 3460) and an omnibus opposition to the Preliminary Approval Motion (ECF No. 37; ECF No. 3462). Certain Sovereigns also filed supplemental oppositions to the Preliminary Approval Motion. ECF No. 38/ECF No. 3464 (California, District of Columbia, Pennsylvania, and Puerto Rico); ECF No. 39/ECF No. 3465 (Maine and Vermont). The California State Water Resources Control Board and the California Department of Corrections and Rehabilitation (the “California Agencies”) filed a joinder in the omnibus opposition and one of the supplemental oppositions (ECF No. 40; ECF No. 3466).

3. Proposed Class Counsel, 3M, and the Sovereigns have met and conferred extensively about issues raised by the Sovereigns concerning the 3M Settlement Agreement. Those discussions and other communications have resulted in the agreements to revise the 3M Settlement Agreement set forth in Exhibit 2 (attached hereto) and described in paragraphs 5–7 and 9–16

herein, only. Neither the Settlement Amount (Ex. 1, §§ 2.66, 3.1, 6.1, 6.12) nor the timing of 3M's payments (Ex. 1, §§ 6.7, 6.8, 6.12; Ex. K) has changed.

4. Plaintiffs, by and through Proposed Class Counsel, and 3M have also agreed to clarifications of the Proposed Preliminary Approval Order, the 3M Settlement Agreement, and Exhibits B, C, D, E, F, H, I, K, M, N, and P to the 3M Settlement Agreement. Those clarifications are reflected in the attached documents at Exhibits 1 to 11 hereto. A short summary of the clarifications set forth in the attached Exhibits follows:

5. The Plaintiffs and 3M agreed to clarify the definition of "Drinking Water" in the 3M Settlement Agreement. Ex. 1, § 2.23.

6. The Plaintiffs and 3M agreed to clarify the definition of "Releasing Parties" in the 3M Settlement Agreement. Ex. 1, § 2.61.

7. The Plaintiffs and 3M agreed to add a definition of "State" in the 3M Settlement Agreement. Ex. 1, § 2.72.

8. The Plaintiffs and 3M agreed to revise the 3M Settlement Agreement to account for a recent settlement. Ex. 1, §§ 6.7.2, 6.8.6, 6.12.

9. The Plaintiffs and 3M agreed to revise the 3M Settlement Agreement to extend the period for Requests for Exclusion to 90 days. Ex. 1, § 8.5.

10. The Plaintiffs and 3M agreed to clarify the "Protection of Ratepayers" provision of the 3M Settlement Agreement. Ex. 1, § 11.4.

11. The Plaintiffs and 3M agreed to revise the 3M Settlement Agreement to replace the "Contribution and Indemnity" provision with a "Protection Against Claims-Over" provision. Ex. 1, §§ 2.11, 11.6.

12. The Plaintiffs and 3M agreed to add a “Liens” provision in the 3M Settlement Agreement. Ex. 1, § 11.7.

13. The Plaintiffs and 3M agreed to add a provision regarding Claims owned by a State or the federal government in the 3M Settlement Agreement. Ex. 1, § 11.10.

14. The Plaintiffs and 3M agreed to add a sentence to the “No Admission of Wrongdoing or Liability” provision of the 3M Settlement Agreement. Ex. 1, § 13.3.

15. The Plaintiffs and 3M agreed to clarify the “More Favorable Terms in Other Settlements” provision of the 3M Settlement Agreement. Ex. 1, § 13.4.1.

16. The Plaintiffs and 3M agreed to certain other typographical corrections in the 3M Settlement Agreement. Ex. 1, §§ 5.1, 5.2.

17. The Plaintiffs and 3M agreed to update and/or add certain information to and correct certain typographical issues in the proposed Notice (Ex. B to the 3M Settlement Agreement), Notice Plan (Ex. C to same) and the Summary Notice (Ex. M to same). Exs. 2, 3, 4.

18. The Plaintiffs and 3M agreed to revise the lists of Phase One Eligible Claimants (Ex. E to the 3M Settlement Agreement), Phase Two Eligible Claimants (Ex. F to same), Systems Owned by a State Government (Ex. H to same), Systems Owned by the Federal Government (Ex. I to same), and Potential Eligible Claimant Plaintiffs (Ex. N to same) to reflect more current and accurate information. Exs. 5, 6, 7, 8, 9.

19. The Plaintiffs and 3M agreed to revise the Payment Schedule (Ex. K to the 3M Settlement Agreement) to account for a recent settlement. Ex. 10.

20. The Plaintiffs and 3M agreed to clarify the Letter from Releasing Party (Ex. P to the 3M Settlement Agreement) to better reflect the intent of the settlement. Ex. 11.

21. The Plaintiffs and 3M also agreed that any stay of or injunction against litigation by Class Members or Released Persons, including but not limited to the invocation of the All Writs Act, shall not apply to cases brought by States (as the term is defined in Ex. 1, § 2.72).

22. In addition, Proposed Class Counsel have confirmed with the Sovereigns that they have always intended to establish a settlement-specific website with information that will allow Class Members to derive a good-faith estimate of what they may receive under the 3M Settlement Agreement if they participate in it, which is now live online, unrestricted, and accessible to the public at [www.PFASWaterProviderSettlement.com](http://www.PFASWaterProviderSettlement.com). This reference material is a good faith estimate only and not the actual settlement awards because allocations depend on data that is not publicly available, the extent of participation rates among Class Members is unknown, and the full extent of Impacted Water Sources is unknown. These factors are unknowable until all Claims Forms have been submitted and processed; however, the reference material will nonetheless prove useful in providing a good-faith estimate and is now available on the settlement-specific website, [www.PFASWaterProviderSettlement.com](http://www.PFASWaterProviderSettlement.com).

23. The Sovereigns and the California Agencies have agreed that, with the aforementioned clarifications and revisions to the 3M Settlement Agreement (*see supra* paragraphs 5–7 and 9–16 herein), they do not oppose the Preliminary Approval Motion.

24. Based on the clarifications and revisions to the 3M Settlement Agreement (*see supra* paragraphs 5 to 16 herein), the Sovereigns have agreed to withdraw their motion for intervention (ECF No. 35; ECF No. 3460), their omnibus opposition to the Preliminary Approval Motion (ECF No. 37; ECF No. 3462), and their supplemental oppositions to the Preliminary Approval Motion (ECF No. 38; ECF No. 3464). The California Agencies have agreed to withdraw

their joinder in opposition to the Preliminary Approval Motion (ECF No. 40; ECF No. 3466) by separate notice of withdrawal.

Accordingly, the Plaintiffs, 3M, and the Sovereigns respectfully request that the Court consider the attached clarifications as part of the proposed 3M Settlement Agreement and the Proposed Preliminary Approval Order when addressing the pending Preliminary Approval Motion.

Dated: August 28, 2023

Respectfully submitted,

/s/

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**CERTIFICATE OF SERVICE**

I hereby certify that on August 28, 2023, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system which will send notification of such filing to all attorneys of record.

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